

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MICHEAL (SUSIE) HOFFMAN,

Plaintiff,

v.

UNITED AIRLINES, INC., UNITED
AIRLINES FRONTLINE VOLUNTARY
SEPARATION PROGRAM (VSP2), UNITED
AIRLINES FRONTLINE VOLUNTARY
SEPARATION LEAVE (VSL) PROGRAM,
UNITED AIRLINES CONSOLIDATED
WELFARE BENEFIT PLAN, and UNITED
AIRLINES RETIREE MEDICAL PROGRAM,

Defendants.

Civil Action No. 1:21-cv-06395

Honorable Robert M. Dow, Jr.

**DECLARATION OF LINCOLN LOUNSBURY IN SUPPORT OF DEFENDANTS'
MOTION TO DISMISS PLAINTIFF'S COMPLAINT**

I, Lincoln Lounsbury, pursuant to 28 U.S.C. §1746, declare under penalty of perjury that the following statements are true and correct:


1. I am over eighteen (18) years of age, and I have personal knowledge of, and am fully competent to testify to, the matters set forth herein.
2. I am employed by United Airlines, Inc. ("United") as Senior Managing Counsel, Benefits. I have held this position since August 28, 2006. In that position, I have responsibilities related to United's employee benefits plans.
3. A true and correct copy of the United Airlines, Inc. 2020 Frontline Voluntary Separation Program 2 Immediate Separation Plan Document and Summary Plan Description is attached as Exhibit A.

4. A true and correct copy of the United Airlines, Inc. 2020 Frontline Voluntary Separation Program 2 Governing Documents for Option A and Option B is attached as Exhibit B.
5. A true and correct copy of the Frontline Voluntary Separation Program (VSP2) – FAQs is attached as Exhibit C.
6. A true and correct copy of the Frontline Voluntary Separation Program (VSP2) – Program Overview is attached as Exhibit D.
7. A true and correct copy of the United Airlines, Inc. 2020 Frontline Voluntary Separation Program 2 Waiver of Rights and Claims / Release from Liability that Ms. Hoffman executed in conjunction with her election to participate in the VSP2 is attached as Exhibit E.
8. A true and correct copy of the United Airlines, Inc. 2021 Voluntary Separation Leave Program B (Leave-Focused Program) Governing Document for the VSL is attached as Exhibit F.
9. A true and correct copy of the Frontline Voluntary Separation Leave (VSL) – FAQs is attached as Exhibit G.
10. A true and correct copy of the Frontline Voluntary Separation Leave (VSL) – Program Overview is attached as Exhibit H.
11. A true and correct copy of United's 2017 Retiree Early Out Eligibility Policy is attached as Exhibit I.
12. A true and correct copy of United's Retiree Early Out Eligibility Policy, effective October 30, 2020 is attached as Exhibit J.
13. A true and correct copy of United's HelpHub Response, dated February 15, 2021, to Ms. Hoffman's request for VSL benefits is attached as Exhibit K.

14. A true and correct copy of United's letter, dated July 29, 2021, responding to Ms. Hoffman's request for VSL benefits is attached as Exhibit L.

15. I swear or affirm, under penalty of perjury, that the foregoing statements are true and correct to the best of my knowledge, information, and belief.

Executed this 31st day of January 2022, at Chicago, Illinois.


Lincoln Lounsbury